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Honorable Rebecca L. Pennell

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
RICHLAND DIVISION**

ONSHORE QUALITY CONTROL
SERVICES, LLC, a Texas limited liability
company,

Plaintiff,

vs.

STEVEN BROMLEY, an individual

Defendant.

Case No. 4:24-cv-05134-RLP

**STATEMENT OF MATERIAL
FACTS NOT IN DISPUTE**

Onshore Quality Control Specialists, LLC (“QCS”) hereby submits its
Statement of Material Facts Not in Dispute in accordance with Local Rule
56(c)(1)(A).

1. Bromley did not report any discrimination on the basis of a protected
status as defined by the Washington Law Against Discrimination (“WLAD”) on or
before April 18, 2024. *See* ECF No. 11.

1 2. Bromley has never alleged that QCS discriminated against him on the
2 basis of “race, creed, color, national origin, citizenship or immigration status, sex,
3 honorably discharged veteran or military status, sexual orientation, or the presence of
4 any sensory, mental, or physical disability or the use of a trained dog guide or service
5 animal by a person with a disability.” *See* ECF No. 11; *See also* RCW 49.60.030(1).

6 3. On March 15, 2024, Bromley acknowledged that the release language
7 contained in the proposed settlement agreement between the parties was a “full
8 release” that would extinguish any then-existing SNMA claims when he demanded
9 QCS “re-write” the Agreement to reflect his intention not to release such claims. ECF
10 No. 22-2 at 98.

11 4. On March 15, 2024, QCS stated that it would “add the clarifying sentence
12 about the confidentiality provision not being intended to infringe on your rights under
13 the Silenced No More Act as that was always the intent.” ECF No. 22-2 at 98.

14 5. On April 12, 2024, QCS told Bromley’s attorney it would not settle any
15 claims unless all claims, including any potential SNMA claims, were released by the
16 Agreement. ECF 22-2 at 131.

17 6. Bromley executed a Confidential Settlement Agreement and Release of
18 All Claims on April 18, 2024 (the “Agreement”). ECF No. 22-2 at 140-144.

19 7. Administrative Law Judge, Evan Nordby, approved the Agreement on
20 April 23, 2024. ECF No. 26-1.

1 8. On September 10, 2024, after he signed the Agreement and received the
2 Settlement Payment, Bromley demanded \$100,000 to resolve alleged violations of the
3 SNMA and WLAD, specifically concerning purported wrongs that occurred before he
4 signed the Agreement in which he released all such claims. ECF No. 26-2.

5 Respectfully submitted this 18th day of June, 2025.

6 OGLETREE, DEAKINS, NASH, SMOAK
7 & STEWART, P.C.

8 By: /s/ Laurence A. Shapero

9 By: /s/ Lauren Titchbourne

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18 *Attorneys for Onshore Quality Control*
19 *Specialists, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of June, 2025, I served the foregoing
STATEMENT OF MATERIAL FACTS NOT IN DISPUTE via the method(s) below
on the following parties:

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Attorney for Defendant

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Seattle, Washington.
- ☐ by **e-mailing** a true and correct copy to the last known email address of each person listed above.

SIGNED THIS 18th day of June, 2025 at Seattle, Washington.

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

By: /s/ Mary J. Klemz
Mary J. Klemz, Practice Assistant
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